

ROBINS  KAPLAN LLP

1325 AVENUE OF THE AMERICAS 212 980 7400 TEL
SUITE 2601 212 980 7499 FAX
NEW YORK, NY 10019 ROBINSKAPLAN.COM

GABRIEL BERG
212 980 7458 TEL
GBERG@ROBINSKAPLAN.COM

May 5, 2023

VIA ECF

Hon. Nelson Stephen Román
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *The Wave Studio, LLC. v. Trivago N.V. et al*,
Case No. 7:23-cv-03586-NSR

Dear Judge Román:

We represent Plaintiff The Wave Studio, LLC in the above-referenced action. Plaintiff has filed an Order to Show Cause seeking a temporary restraining order and preliminary injunction to enjoin Defendants' ongoing infringement of Plaintiff's copyrighted works. As part of this filing, Plaintiff has submitted the Declaration of Lee Kar Yin, Wave's sole owner, member and manager.

We submit this letter motion to request that Exhibits 1 through 10 to the Declaration of Lee Kar Yin be filed under seal pursuant to Your Honor's Individual Practices, permitting the filing of proprietary or trade secret information under seal.

Specifically, these referenced exhibits represent examples of the copyright protected photographic works of The Wave Studio, the very works that Plaintiff seeks to protect from Defendants' ongoing infringement by way of this action. The copyrighted works are proprietary to The Wave Studio, LLC. For the foregoing reasons, Plaintiff respectfully requests that this Court order Exhibits 1 through 10 be filed under protective seal.

Sincerely,

Gabriel Berg

Gabriel Berg
Partner